

James H. Goetz
J. Devlan Geddes
GOETZ, GALLIK & BALDWIN, P.C.
35 North Grand Avenue
P.O. Box 6580
Bozeman, Montana 59715
(406) 587-0618

Bonnie Steingart (admitted pro hac vice)
John W. Brewer (admitted pro hac vice)
FRIED, FRANK, HARRIS, SHRIVER & JACOBSON LLP
One New York Plaza
New York, New York 10004
(212) 859-8000

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ATTORNEYS FOR PLAINTIFF
MAY - 6 2005

CLERK, U.S. DISTRICT COURT
DISTRICT OF MONTANA
BILLINGS, MONTANA

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
BUTTE DIVISION**

-----X
MAGTEN ASSET MANAGEMENT CORPORATION,

Plaintiff,

- against -

MIKE J. HANSON and ERNIE J. KINDT,

Defendants.
-----X



05 - 499

Cause No. CV-04-26-BU-RFC

**WRITTEN REPORT
REGARDING STIPULATED
DISCOVERY PLAN**

On April 22, 2005, counsel for the parties conferred regarding a discovery plan and an Early Neutral Evaluation. The parties agree that an Early Neutral Evaluation would not be helpful in this case.

Subject to the Court's approval, THE UNDERSIGNED PARTIES hereby agree and submit the following joint discovery plan:

1. Fact Discovery: All discovery other than expert discovery will be completed no later than Tuesday, January 31, 2006.

2. Expert Discovery: The parties believe expert discovery will be necessary. The initial disclosure reports required by Rule 26(a)(2) with respect to liability experts and plaintiff's damages experts will be simultaneously disclosed by Friday, March 31, 2006. Rebuttal reports, if any, to these initial expert reports, as well as the initial disclosure and report of defendants' damages experts will be served by Monday, May 1, 2006. Any rebuttal report by plaintiff's damages experts will be disclosed by Monday, May 15, 2006. All expert discovery will be completed no later than Friday, June 30, 2006.

3. Limitations on Discovery: The parties believe that it will be appropriate for the Court to enter an order providing for the confidential treatment of certain information disclosed in discovery. The parties are currently attempting to reach agreement on a proposed form of protective order for the Court's review.

4. Special Discovery Needs: There are currently no special discovery needs.

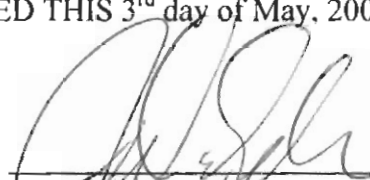
5. Initial Disclosures: The parties have agreed by stipulation to waive the initial disclosure otherwise required by Rule 26(a)(1)(B) but to make the rest of the initial disclosures required by Rule 26(a) no later than Tuesday, May 17.

6. Time to Amend Pleadings: All parties must move to amend pleadings or add new parties by July 29, 2005.

7. Number of Depositions: The parties believe that the presumptive limitations of Rule 30(a)(2)(A) should be modified to permit each side to take up to fifteen depositions, with the parties free to seek leave of court to take depositions in excess of that limit to the extent justified by subsequent developments in the case.

The parties do not believe that any other special orders are necessary at this time.

RESPECTFULLY SUMITTED THIS 3rd day of May, 2005.



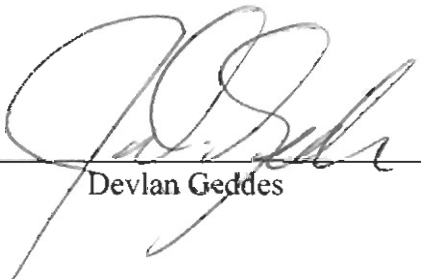
James H. Goetz
Devlan Geddes
GOETZ, GALLIK & BALDWIN, P.C.
35 North Grand Avenue
P.O. Box 6580
Bozeman, Montana 59771-6580
Tel. (406) 587-0618
Fax. (406) 587-5144

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served this 3rd day of May, 2005, as indicated below, upon the following:

Stanley T. Kaleczyc Kimberly A. Beatty BROWNING, KALECZYC, BERRY & HOVEN, P.C. 139 North Last Chance Gulch P.O. Box 1697 Helena, MT 59624 Tel. (406) 433-6820 Fax. (406) 433-6883	<input checked="" type="checkbox"/> U. S. Mail <input type="checkbox"/> Federal Express <input type="checkbox"/> Hand-Delivery <input type="checkbox"/> Via Fax: (406) 433-6883
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Devlan Geddes